

Hearing Date and Time: September 15, 2009 at 10:00 a.m. (prevailing Eastern time)

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Creditors of Lehman Brothers Holdings Inc., et al.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____	X	
In re:	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>	:	Case No. 08-13555 (JMP)
	:	(Jointly Administered)
Debtors.	:	
_____	X	

**STATEMENT OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS IN FURTHER SUPPORT OF THE
DEBTORS' ALTERNATIVE DISPUTE RESOLUTION MOTION**

The Official Committee of Unsecured Creditors (the "Committee") of Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors-in-possession in the above-referenced chapter 11 cases (collectively, the "Debtors") files this statement in further support of the Debtors' Motion Pursuant to Section 105(A) of the Bankruptcy Code and General Order M-143 for Authorization to Implement Alternative Dispute Resolution Procedures for Affirmative

Claims of Debtors Under Derivatives Contracts (the “ADR Motion”) (dated July 20, 2009) (Docket No. 4453) and the Supplemental Declaration of Peter Gruenberger (the “Gruenberger Declaration”) (dated September 11, 2009) (Docket No. 5121). In support thereof, the Committee respectfully states as follows:

1. On September 11, 2009, the Debtors filed the Gruenberger Declaration, which detailed the Debtors’ and the Committee’s efforts since August 26, 2009 to resolve the fifty-six objections filed by Derivatives Counterparties.¹ The Committee actively participated in discussions with the Debtors, certain Derivatives Counterparties and Indenture Trustees, which resulted in the compromises reflected in Exhibit F to the Gruenberger Declaration (the “Revised Proposed ADR Order”). The Committee agrees with the Debtors that the compromises reflected in the Revised Proposed ADR Order are appropriate. Notably, these compromises resulted in the withdrawal of thirty-eight (38) objections to the ADR Motion.

2. The Committee continues to believe that the relief sought in the ADR Motion is necessary and appropriate, asks that the Court deny the remaining objections, and enter the Revised Proposed ADR Order.

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¹ Terms used, but not otherwise defined herein, shall have the meaning set forth in the ADR Motion or the Gruenberger Declaration.

Dated: New York, New York
September 14, 2009

MILBANK, TWEED, HADLEY & M^cCLOY LLP

By: /s/ Dennis F. Dunne

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